

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

IN RE:

EDWARD TRAE GREEN, III
Debtor.

Case No.: 09-17646-SSM
Chapter 13

APPLICATION FOR ATTORNEY'S FEES

COMES NOW, Scott H. Donovan, Counsel for Debtor, and applies to this Court for an award of Attorney's fees and costs and in support of said Motion represents to the Court as follows:

1. That the Debtor filed a Petition for relief under the provisions of Chapter 13 of the Bankruptcy Code on September 18, 2009
2. That in representation of the Debtor, the applicant has provided those services set forth in the Invoice, attached hereto and incorporated herein by reference as Exhibit A which sets forth pursuant to Rule 2016, (1) a detailed statement of the services rendered, time expended totaling \$7,500.00 including the filing fee in this matter, and (2) the amount requested of \$6,000.00.
3. That the applicant does hereby state that the Debtor has heretofore paid a total of \$1,500.00 from the Debtor's funds prior to the filing of this case, and promised to compensate the applicant at his hourly rate of \$250.00 for the applicant's time representing the Debtor in this case.
4. That there has been no sharing of compensation with any other entity or Attorney.

5. That the fees were reasonable and necessary in order to benefit the debtor and the Estate, the services provided contain no charges of a type normally prohibited in this jurisdiction, and the payment of the fees are provided for in the Confirmed Modified Plan.

WHEREFORE, applicant requests this Court award Attorney's fees and costs of \$7,500.00, including \$1,500.00 already paid by Debtor, and an additional \$6,000.00 to be paid forthwith as a priority administrative expense prior to all others creditors; and for such other and further relief as may seem just.

SCOTT H. DONOVAN, P.C.

/s/Scott H. Donovan
SCOTT H. DONOVAN, ESQUIRE
VSB #24592

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was electronically delivered to The U.S. Trustee, Thomas Gorman, Chapter 13 Trustee, and to Debtor, this 10th day of March, 2011.

/s/Scott H. Donovan
Scott H. Donovan, Esquire

EXHIBIT A

Scott H. Donovan, P.C.
9402 Grant Avenue

Manassas, VA 20110-5536

ScottHDonovan@aol.com

703-257-1159, fx703-335-1620

Invoice

DATE	INVOICE #
9/16/2009	5867

BILL TO

Green, Edward, III
10241 Roberts Common Lane
Burke, VA 22015

DATE	DESCRIPTION	HOURS	TERMS	
			RATE	AMOUNT
9/15/2009	Initial Consultation regarding Bankruptcy	1	250.00	250.00
9/16/2009	Research regarding Equitable Distribution Claim in Bankruptcy 7 vs 13; Teleconf with Mr Green; Teleconf with Don Coulter, Divorce Attorney.	3	250.00	750.00
9/17/2009	Meeting with Mr Green to discuss Chapter 13 options; Prepare Petition and other Bk papers; Teleconf with Mr Green re Inc/Exp Statement and Income records; Meeting with Mr Green to sign papers	4	250.00	1,000.00
12/1/2009	Received and reviewed Objection to Plan Motion to Dismiss Plan; Teleconf with client	0.3	250.00	75.00
12/9/2009	Prepare for hearing.	1	250.00	250.00
12/9/2009	Go to BK court and conduct Confirmation Hearing.	5	250.00	1,250.00
12/31/2009	Message from client requesting documents for Atty Coulter; Email to Green with copies of all BK.	0.2	250.00	50.00
1/27/2010	Received and reviewed Opinion of Judge Mitchell; Teleconf with client	1	250.00	250.00
			Total	
				Balance Due

Scott H. Donovan, P.C.

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TERMS

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
2/11/2010	Received and reviewed explanation of increase of Credit Line; Check Claims Register to see Sonia Green not file Proof of Claim; Teleconf with client; Prepare modified plan.	2	250.00	500.00
2/17/2010	Received and reviewed Crosson's motion for leave to file a late claim; Draft Response to motion.	2	250.00	500.00
3/22/2010	Meeting with Mr Greene	0.5	250.00	125.00
3/24/2010	Prepare for hearing; Meeting with Trustee outside of Court before hearing; Attend Motion for leave to file an informal Proof of Claim; Meeting with Crossen and client in hallway after court.	2.5	250.00	625.00
5/5/2010	Prepare and file Subpoena Duces Tecum to Bank of America; Several telecons with BOA representatives regarding Subpoena issues	1.5	250.00	375.00
5/14/2010	Meeting with client to go thru multiple Bank Statements to determine balances in all accounts and to collect statements from HELOC with BOA since 1/2008. Prepare Answers and Responses to Discovery from ex-wife Sonia.	2.5	250.00	625.00

Total**Balance Due**

Scott H. Donovan, P.C.

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 Burke, VA 22015

TERMS

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
5/26/2011	Prepare for hearing and Court appearance for hearing on Confirmation of First modified plan	2.5	250.00	625.00
12/30/2010	Received and review Memo of Opinion from Judge Mitchell; Revise and email revised Plan to client.	1	250.00	250.00
				Total \$7,500.00
				Balance Due \$6,000.00